

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

NOTICE OF LIEN PERFECTION PURSUANT TO 11 USC § 546(b)(2)

LIEN HOLDER: Cedars Enterprises Too, Inc.

DEBTOR: Big Lots Stores, LLC

COLLATERAL: Real property at 1815 W. Slauson Ave., Los Angeles, CA 90047-1127

LIEN PERFECTED: Attached hereto and incorporated by reference herein is a true and correct copy of the mechanic's lien recorded in the Los Angeles County, California, property records as described in **Exhibit A**.

Cedars Enterprises Too, Inc. ("Cedars"), by and through its counsel, hereby provides, pursuant to 11 U.S.C. § 546(b)(2), notice of the perfection of its mechanic's lien, and states as follows:

1. Cedars is a corporation organized under the laws of the State of California and maintains its principal place of business at 18757 Turfway Park, Yorba Linda, CA 92886.

2. Cedars provided certain services, labor, and materials (the "Cedars Services") to Big Lots Stores, LLC (the "Debtor") for the improvement, renovations, and/or alteration of property located at 1815 W. Slauson Ave., Los Angeles, CA 90047-1127 (the "Property"). The

¹ Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (681); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC< LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the Debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Property is or was owned by Big Lots Stores, 4900 E. Dublin Granville Rd., Westerville, OH 43081-7651. Additional owners are Regent Park Properties LP, 420 Wilshire Blvd., Ste. 1500, Los Angeles, CA 90048.

3. The total amount of the Cedars Services provided to the Debtor, for which payment is outstanding, is \$275,000.00.

4. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law requires the seizure of property or the commencement of an action as a condition to perfecting a lien, and such property has not been seized or such action has not been commenced prior to the filing of a bankruptcy petition, the claimant may file a notice with the Bankruptcy Court to perfect the lien.

5. Pursuant to section 546(b)(2) of the Bankruptcy Code, Cedars hereby provides notice to the Debtor, Debtor's counsel, the Office of the United States Trustee for the District of Delaware, Debtor's secured lenders, the owners of the Property, and to all others interested parties of Cedars's rights as a perfected lienholder in the Property.

6. In accordance with the laws of the State of California, Cedars filed a Mechanic's Lien in the real property records in Los Angeles County, California. A true and correct copy of the Mechanic's Lien is attached hereto as **Exhibit A**.

7. The filing of this notice shall not be deemed to be waiver of Cedars's rights to seek relief from the automatic stay imposed by section 362 of the Bankruptcy Code to foreclose its lien and/or any other rights or defenses.

The filing of this notice shall further not be construed as an admission that such filing is required under the Bankruptcy Code, applicable California law, or any other applicable law. Additionally, Cedars hereby makes no admission of fact or law and asserts that its lien is senior to and effective against entities that may have previously acquired rights in the Property.

8. Cedars reserves the right to amend and/or modify this notice.

Dated: November 6, 2024

RAINES FELDMAN LITTRELL LLP

/s/ Thomas J. Francella, Jr.
Thomas J. Francella Jr. (No. 3855)
1200 North Broom Street
Wilmington, DE 19806-4204
Telephone: (302) 772-5805
Email: tfrancella@raineslaw.com

-and-

GOLDEN GOODRICH LLP

Jeffrey I. Golden
33070 Bristol Street,
Suite 650
Costa Mesa, California 92626
Telephone: (714) 966-1000
Fax: (714) 966-1002
E-mail: jgolden@go2.law

Counsel for Cedars Enterprises Too, Inc.